

BROWN KWON & LAM LLP Brown Kwon & Lam LLP Attorneys at Law 521 Fifth Avenue, 17th Floor New York, NY 10175

Tel.: (212) 295-5828 Fax: (718) 795-1642

Email: info@bkllawyers.com

Writer's Direct: William Brown, Esq. wbrown@bkllawyers.com

Application **GRANTED**. The parties shall submit their motion for settlement approval by **April 17, 2024**.

UNITED STATES DISTRICT JUDGE

Dated: April 8, 2024

New York, New York

Via ECF

Hon. Lorna G. Schofield, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, NY 10007

RE: Quarrato, et al. v. Madison Global LLC., et al.

Case No. 23-cv-5594(LGS)

Dear Judge Schofield:

This firm represents Plaintiffs in the above referenced matter. We write jointly with counsel for Individual Defendants Thomas Makkos and Marcia Maksymowcz, to respectfully request that the deadline to file a motion for settlement approval pursuant to *Cheeks v. Freeport Pancake House, Inc.* be extended until April 17, 2024. The settlement agreement has now been fully executed. However, additional time is needed to determine the parties' obligations, if any, with respect to Defendant Madison Global LLC's bankruptcy proceeding.

The parties thank Your Honor for your time and attention.

Respectfully submitted,

/s/ William Brown

William Brown, Esq.

cc: all parties via ECF